



County of Santa Cruz

BOARD OF SUPERVISORS

701 OCEAN STREET, SUITE 500, SANTA CRUZ, CA 95060-4069

(831) 454-2200 FAX: (831) 454-3262 TDD: (831) 454-2123

JANET K. BEAUTZ
FIRST DISTRICT

ELLEN PIRIE
SECOND DISTRICT

NEAL COONERTY
THIRD DISTRICT

TONY CAMPOS
FOURTH DISTRICT

MARK W. STONE
FIFTH DISTRICT

September 7, 2007

A. G. Kawamura
California Secretary of
Food and Agriculture
1220 N Street
Sacramento, CA 95814

RE: LIGHT BROWN APPLE MOTH ERADICATION AND CONTROL EFFORTS

Dear Mr. Kawamura:

On August 28, 2007, the Santa Cruz County Board of Supervisors received a report from our County Agricultural Commissioner, Ken Corbishly, regarding eradication and control efforts related to the light brown apple moth. As part of this report, we were advised that with the number of finds in our area, an eradication effort similar to that proposed in Monterey County, including aerial treatments of pheromone attractants using fixed wing aircraft, may be ordered by the USDA and CDFA for Santa Cruz County.

We understand that the light brown apple moth poses a potential threat; however, we have a number of questions and objections about any eradication efforts that would include aerial treatments. While we recognize that the decisions about eradication efforts will be made by state and federal agencies, we believe it is critically important that more information is made available to local government, local growers, and residents in our community if any aerial spraying, even the spraying of pheromones, is contemplated.

Specifically, no aerial treatment should take place unless residents in our county are given notice that this is the type of pest management anticipated by the USDA and CDFA. In the face of any proposal for aerial spraying, residents in our community have every right to request that your office conduct a wide series of public meetings so the public can be informed about the implications of this spraying, have an opportunity to submit their comments, ask questions, receive answers, and convey their concerns firsthand to those making these significant decisions.

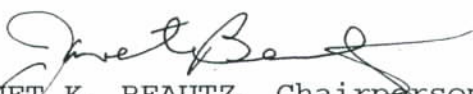
In addition, we are very concerned about requirements imposed on growers to apply broad spectrum pesticides in a nursery setting. The economically and environmentally onerous regulations associated with this pest could result in an unfair manipulation of the market, to the detriment of local growers, and could certainly have detrimental health effects.

Therefore, alternative regulations focused on lowering the broad spectrum use of pesticides should be developed for use by nurseries. Our community has worked long and hard to understand and manage broad spectrum pesticides and develop effective alternative Integrated Pest Management practices. The current requirement of broad spectrum pesticides denigrates those efforts. As a result, we believe it is critically important that state and federal agencies continue to work with the Technical Working Group to devise effective, appropriate pest management solutions and to communicate with growers about alternatives.

In summary, we recognize that pheromones have been used on the ground in hand applications by organic farmers for years. In fact, this type of application is consistent with the Integrated Pest Management efforts in our county. However, we are extremely concerned about an aerial application that may be used for a pest which may not require this drastic level of response. Our Board believes that it is critically important to use the least toxic alternatives possible and to minimize the burdens placed on local growers and nurseries to the greatest extent possible.

Thank you for your consideration of our very real concerns.

Sincerely,


JANET K. BEAUTZ, Chairperson
Board of Supervisors

JKB:ted

cc: Clerk of the Board
Agricultural Commissioner
Jeff Rosendale

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Osama El-Lissy
Director, Emergency Management
Emergency and Domestic Programs
Animal Plant Health Inspection Services
U.S. Department of Agriculture
4700 River Road, Unit 134
Riverdale, MD 20737

RE: LIGHT BROWN APPLE MOTH ERADICATION AND CONTROL EFFORTS

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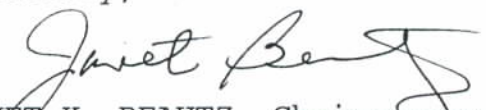
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JANET K. BEAUTZ, Chairperson
Board of Supervisors

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